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IN PRO PER
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,

Plaintiff and Counterclaim

Defendant

vs.

ASHLEY RICHARDSON,

Defendant and Counterclaim

Plaintiff

Case No.: 2:23-cv-04669-MEMF-MAR

DECLARATION OF ASHLEY
RICHARDSON IN OPPOSITION TO
PLAINTIFF TAYLOR THOMSON'S
MOTION FOR PROTECTIVE ORDER

DECLARATION OF ASHLEY RICHARDSON (EX PARTE & MERITS)

I, Ashley Richardson, declare:

1. I am the Defendant, proceeding pro se. I have personal knowledge of the facts stated and could testify competently to them.
2. I have never disclosed to anyone any materials obtained from discovery in this case. Any statements I made publicly were based solely on my own lived experience or materials obtained prior to and outside of this litigation.
3. As of October 15, 2025, Plaintiff had not produced core internal communications I requested (including text messages and emails with: Madeleine Thomson, Cameron

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1 Moulène, Kevin Fitzgerald, Robert Sabella, Hazel Williams Carter, Shiro Gutzie, Ron
2 Murphy, and Leigh Wang, as well as group-chat messages and the Dec. 2020–present
3 disparagement window). Plaintiff’s October 15 production did not contain those
4 categories.


4. I have consistently asked to schedule both depositions promptly and back-to-back at a
5 neutral, non-residential location, and I have attempted to meet and confer in good faith
6 since the Court’s October 10 order.

7 I declare under penalty of perjury under the laws of the United States that the foregoing is true
8 and correct.

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10
11
12 Respectfully submitted,

13
14 Ashley Richardson

15
16 Dated October 24, 2025.

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18 
19 _____

Ashley Richardson

In Pro Per